

REED SMITH LLP

A limited liability partnership formed in the State of Delaware

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8 Attorneys for Defendant
9 Pan-American Life Insurance Company

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 DONNA MATHEWS,

13 Plaintiff,

14 vs.

15 PAN-AMERICAN LIFE INSURANCE
COMPANY,

16 Defendant.

No.: C 07-02757 SBA

**DECLARATION OF THOMAS A. EVANS
IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT, OR
ALTERNATIVELY, PARTIAL SUMMARY
JUDGMENT**

Date: June 10, 2008
Time: 1:00 p.m.
Place: Ctrm 3, 3rd Floor

Honorable Sandra B. Armstrong

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20 I, Thomas A. Evans, hereby declare as follows:

21 1. I am an attorney at law and a partner with the firm of Reed Smith LLP, attorneys of
22 record for defendant Pan-American Life Insurance Company ("Pan-American"), in the above action.
23 I have personal knowledge of the matters hereinafter set forth, and if called as a witness I would and
24 could testify thereto under oath.

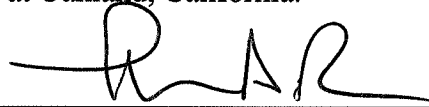
25 2. A true and correct copy of the Complaint is attached hereto as Exhibit A.

26 3. On March 13, 2008, I attended the deposition of Cory Simon in this action. A true
27 and correct copy of excerpts from the reporter's certified transcript from Mr. Simon's deposition is
28 attached hereto as Exhibit B.

1 4. On April 3, 2008, I took the deposition of plaintiff Donna Mathews in this action. A
2 true and correct copy of excerpts from the reporter's certified transcript from Ms. Mathews'
3 deposition is attached hereto as Exhibit C.

4 5. As counsel for Pan-American in this action, we propounded and served First Set of
5 Interrogatories to Plaintiff Donna Mathews. Plaintiff served her Responses to Defendant's First Set
6 of Interrogatories by mail on March 19, 2008. A true and correct copy of Plaintiff's Responses is
7 attached hereto as Exhibit D.

8 I declare under penalty of perjury under the laws of the United States that the foregoing is
9 true and correct. Executed on April 29, 2008, at Oakland, California.

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THOMAS A. EVANS

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